

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

FILED IN CLERK'S OFFICE
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FEB 15 2024

KENNETH JOHNSON, et al,

Plaintiffs

v.

GEORGIA BUREAU OF
INVESTIGATIONS, et al,
Defendants.

KEVIN P. WEIMER, Clerk
By: *Daniel B. Bepko* Deputy Clerk

CIVIL ACTION NO:
1:23-cv-04218-LMM

JURY TRIAL DEMAND

PLAINTIFFS' MOTION FOR
LEAVE TO FILE AMENDED
COMPLAINT TO ADD
PARTIES AND CLAIMS
TO THIS ACTION AND
OTHER EQUITABLE RELIEF

**PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT
TO ADD PARTIES AND CLAIMS TO THIS ACTION AND OTHER
EQUITABLE RELIEF**

Pursuant to Rule 15 of the Federal Rules of Civil Procedure the Plaintiffs Kenneth and Jacquelyn Johnson (hereinafter "The Johnson's") respectfully move the Court for leave to file the attached Third Amended Complaint for the sake of Justice to include additional parties, causes of action, and other equitable relief.

Rule 15 provides that "a party may amend its pleading [with] the court's leave" and that "[t]he court should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2).

Through the Third Amended Complaint, Plaintiffs seek to add six new Defendants—three corporations, Gray Television Inc., CNHI, LLC, and Elliott Blackburn Law as well as three state agencies, Office of the Attorney General, Georgia Department of Public Health, and the State Bar of Georgia—that were significantly involved with broadcasting and publishing the erroneous claim by the Defendants’ that Kendrick Johnson died accidentally, publicly defaming the Plaintiffs’ by falsely alleging the Plaintiffs’ evidence supported claims that their minor son did not die from an accident but instead died from blunt force trauma after being viciously assaulted as “unsubstantiated”, for maintaining inaccurate vital statistic record for their minor son’s cause of death by failing to amend the death certificate to protect the integrity and accuracy of vital records¹ even after being provided with adequate evidence justifying the amendment, deprivation of rights, and neglect to protect rights. Plaintiffs believe that, along with the original Defendants, these new Defendants engaged in practices that violate their rights under the Fourteenth Amendment to the U.S. Constitution.

Further, Plaintiffs seek to allege eight new causes of action based on conduct and practices uncovered by Plaintiffs and further demonstrated in Defendants’ own

¹ See O.C.G.A 31-10-23 Amendment of certificates or reports (a) Unless otherwise specified by law, a certificate or report registered under this chapter may be amended in accordance with this chapter and regulations adopted by the department to protect the integrity and accuracy of vital records.

court filings, official responses to Plaintiffs evidence supported complaint of misconduct by one of the new Defendants for altering a public record sought by the Plaintiff and for making false statements, and for providing aid and comfort to someone when it is known an offense against the United States has been committed further obstructing the “due administration of justice.”

For all these reasons, and those stated in the attached memorandum in support, Plaintiffs respectfully request that the Court grant Plaintiffs leave to file the attached Third Amended Complaint.

Respectfully submitted,

Dated: February 14, 2024

/s/ Kenneth Johnson
Kenneth Johnson

/s/ Jacquelyn Johnson
Jacquelyn Johnson

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing ***PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT TO ADD PARTIES AND CLAIMS TO THIS ACTION AND OTHER EQUITABLE RELIEF*** with the Clerk of the Court via United States Postal Service mail. I also certify that I mailed by United States Postal Service the foregoing document to the following participants:

Respectfully submitted,

Dated: February 14, 2024

/s/ Kenneth Johnson

Kenneth Johnson

/s/ Jacquelyn Johnson

Jacquelyn Johnson

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Atlanta, GA 30334

State Bar of Georgia
c/o J. Antonio DelCampo, President
104 Marietta St. NW, Suite 100
Atlanta, GA 30303

Gray Television, Inc.
c/o Hilton H. Howell Jr., CEO
4370 Peachtree Road, NE Suite 400
Atlanta, GA 30319

CNHI, LLC
c/o Donna Barrett, President
201 Monroe Street, Ste. 450
Montgomery, AL 36104



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